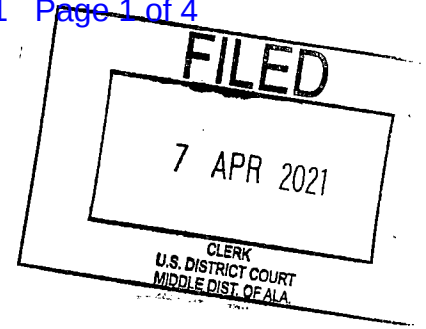


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION



UNITED STATES OF AMERICA)

v.)

CR. NO. 2:21-cr-190-MHT-KFP
[21 U.S.C. § 846]

MAURICE DAUGHTRY,)
a/k/a "Smoke,")
GARREN CHARLES ROGERS,)
THOMAS LEE JAMES, JR.,)
a/k/a "Rick Ross," "T.J.")
NAAMAN RASHAD JACKSON,)
MELODIE DONNE ARMER)
CHEATHAM,)
PAMELA GRAYSON ALLEN,)
TOWANNA LORRELL CHAPMAN,)
JOSEPH ANTHONY COLEMAN,)
CARLOS DANGELO JONES,)
KENNETH JAMES KEITH,)
SHAYLA DENISE MOORER,)
KAMBRIA SYMONE ROBINSON,)
JAMAL ANTHONY THOMAS,)
DEVAN SHELISE WILSON, and)
RUBIN SANDERS)

INDICTMENT

The Grand Jury charges:

COUNT 1
(Controlled Substances Conspiracy)

Beginning on an unknown date and continuing until on or about April 21, 2020, in
Montgomery County, within the Middle District of Alabama, and elsewhere, the defendants,

MAURICE DAUGHTRY,
a/k/a "Smoke,"
GARREN CHARLES ROGERS,
THOMAS LEE JAMES, JR.,
a/k/a "Rick Ross," "T.J."
NAAMAN RASHAD JACKSON,
MELODIE DONNE ARMER CHEATHAM,
PAMELA GRAYSON ALLEN,
TOWANNA LORRELL CHAPMAN,

JOSEPH ANTHONY COLEMAN,
CARLOS DANGELO JONES,
KENNETH JAMES KEITH,
SHAYLA DENISE MOORER,
KAMBRIA SYMONE ROBINSON,
JAMAL ANTHONY THOMAS,
DEVAN SHELISE WILSON, and
RUBIN SANDERS,

knowingly, intentionally, and willfully conspired, combined, and agreed with themselves and with others, including D.B. and D.G., to distribute and to possess with intent to distribute a controlled substance, to wit: oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). All in violation of Title 21, United States Code, Section 846.

FORFEITURE ALLEGATION

A. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853(a), Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461.

B. Upon conviction of the offenses in violation of Title 21, United States Code, Section 846 set forth in Count 1 of this Indictment, the defendants,

MAURICE DAUGHTRY,
a/k/a "Smoke,"
GARREN CHARLES ROGERS,
THOMAS LEE JAMES, JR.,
a/k/a "Rick Ross," "T.J."
NAAMAN RASHAD JACKSON,
MELODIE DONNE ARMER CHEATHAM,
PAMELA GRAYSON ALLEN,
TOWANNA LORRELL CHAPMAN,
JOSEPH ANTHONY COLEMAN,
CARLOS DANGELO JONES,
KENNETH JAMES KEITH,
SHAYLA DENISE MOORER,

KAMBRIA SYMONE ROBINSON,
JAMAL ANTHONY THOMAS,
DEVAN SHELISE WILSON, and
RUBIN SANDERS,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461, any and all property constituting or derived from proceeds defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses in violation of Title 21, United States Code, Section 846.

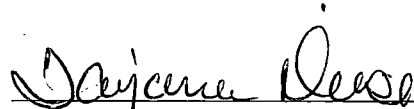
C. If any of the property described in this forfeiture allegation, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty,

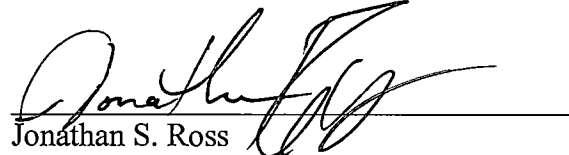
the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

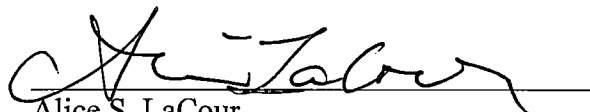
All pursuant to Title 21, United States Code, Section 853(a), Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461.

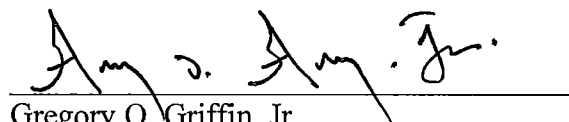
A TRUE BILL:


Foreperson

SANDRA J. STEWART
ACTING UNITED STATES ATTORNEY


Jonathan S. Ross
Assistant United States Attorney


Alice S. LaCour
Assistant United States Attorney


Gregory O. Griffin, Jr.
Assistant United States Attorney